

SUMMARY COMMENTS

Jackson-Washington State Forest Compartment 4 Tract 10, Compartment 8 Tract 18 & 19 30 Day Comment Period Ending: 5/26/2020

Comments Received: 21

The table below is a summary of public comments received concerning the draft Resource Management Guide. The public comments received have been reviewed in their entirety and given due consideration summarized in the Division of Forestry response below.

Comment Summary	Division of Forestry Response
<ul style="list-style-type: none"> • General comments in support of forest management practices that follow science, best management practices, address invasive species and create diverse habitat. • General comments in support of oak management. • General comments in support of sustainable forest management to keep forests diverse, productive, and healthy. • General comments opposing forest management and the harvest prescription portions of the draft RMG citing concerns of potential impacts to aesthetics, plants, animals, habitat diversity, recreation, cultural sensitive areas, and ecological services. • Concern with the use of chemicals containing glyphosate (e.g., Roundup) and other dangerous chemicals. • General comments to protect growth forests. • General concerns with the potential impacts to RTE species. Recommends detailed environmental inventory of wildlife and plants be conducted/included in draft RMG. • Concern with the potential impacts to soil and water resources and effective implementation and monitoring of BMPs. Specific concerns with Delaney Creek, Muscatatuck and East Fork White River. • General concern on the potential spread of invasive species as a result of the proposed management activities. 	<ul style="list-style-type: none"> • The Division of Forestry actively manages its lands for multiple use/multiple benefits. A part of that management is timber production. Annually, the division plans, schedules and implements forest management activities across all state forests. Activities may include: forest inventories, timber harvests, timber stand improvement, tree plantings, invasive species control, and prescribed fire. These activities help sustain the diverse hardwood landscape present and ensure state forests remain healthy providing the multiple use/multiple benefits philosophy for future generations. • Local market conditions are part of the timber bidding process. Pricing and market condition reports are reviewed regularly. • Best management practices (BMP) will be implemented and monitored to address the soil erosion and sedimentation concerns. BMPs are required and included in each timber sales contract. Division of Forestry will respond to reported BMP departures. BMP guidance can be found at: http://www.in.gov/dnr/forestry/files/fo-2005_Forestry_BMP_Field_Guide.pdf

- General concern the draft RMG does not address impacts on climate change and carbon sequestration
- Concern with over logging and logging just for profit
- Concern for the hiking trail leading to Pinnacle Peak.
- Concern for large openings due to the removal of pine.

- BMPs are guidelines, not law. However, contractual stipulations require BMPs to be implemented and followed on all State Forest's. State Forest staff perform regular site visits during active operations and evaluate as part of their post-harvest review.
- Detailed flora and fauna inventories are beyond the scope of tract level management guides. Habitats, communities and species are considered as part of the management planning process. Along with field observations, Natural Heritage Data is reviewed for threatened or endangered species on or near the management unit. ***Please note, for the protection of sensitive flora and fauna NHD review results are not disclosed in draft RMGs.*** Further information on direct and indirect impacts on species and habitats are found in the Indiana State Forest Environmental Assessment. http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf
- Invasive species presence and control needs are monitored as part of the property's normal operations. Treatments may be pre or post-harvest and situational ranging from minor to aggressive based on the presence of the species within the county. Methods may include manual and chemical. Only approved herbicides will be used following forest certification standards.
- Assessing climate change and carbon sequestration is beyond the scope of tract level RMGs. See https://www.in.gov/dnr/forestry/files/fw-carbon_assessment.pdf
- Indiana State Forests contain approximately 985 million board feet of timber. Managed harvest levels are set at a level to insure long term sustainability. These levels are periodically reviewed as new continuous forest inventory data is collected. See https://www.in.gov/dnr/forestry/files/fo-Continuous_Forest_Inventory_Property_Report_2014-2018.pdf

- The prescribed management activities are consistent with silvicultural principles, promotes habitat diversity and supported by inventory data and field assessments. The concerns expressed have been considered and may be further addressed during plan implementation. See http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf.
- State Forest operations adhere to a comprehensive set of forest certification standards to insure long term forest sustainability. Operations are subject to annual 'third party' audits to insure compliance to these standards. <https://www.in.gov/dnr/forestry/7532.htm>
- We recognize that aesthetic impacts are inherent of many forest management activities. This may include visual impacts along roadways and trail segments. Potential impacts will be considered during activity planning and execution.
- Recreation disruptions are likely to occur during management activities. In affected areas hunting access and recreational trails will be temporarily closed or rerouted for safety reasons during active operations. The Division of Forestry will consider recreational impacts during the planning and execution of management activities.
- The Indiana DNR land portfolio covers 520,000+ acres. State Forests are the only DNR properties where long term forest and timber management practices occur. State Forests represents approximately 30% of the DNR portfolio. Set aside lands that are trending towards old growth conditions can be found on a variety of DNR lands, including established nature preserves on State Forests, State Parks, Fish & Wildlife Areas and Nature Preserve lands. These continue to be important conservation strategies.
- No old growth forests are found in the tracts covered by these draft RMGs.

- Implementation of the draft RMG will utilize guidance from the US Fish & Wildlife Service and other sources to avoid take impacts to the Indiana bat and other listed species.
- State Forest management is guided by science and implementation of sound silvicultural principles to insure long term forest health and sustainability. State Forest management adheres to legal mandates and voluntary compliance to comprehensive forest certification standards.
- The state forest system was established in 1903 to restore eroded, worn-out farm land that become abandoned early in the century and directed by Indiana Code. The Division of Forestry has actively managed its land for nearly 120 years for multiple uses/multiple benefits.
- Hardwood Ecosystem Experiment (HEE) and other research continue to document forest impacts and indicate increased biodiversity in managed forests. <http://www.heeforeststudy.org/>
- State Forest timber revenues are well above cost of operations and contribute positively to local and State economies.
- The Division of Forestry manages its lands for multiple uses/multiple benefits proving timber production, biodiversity, watershed protection, recreation, and research areas. Recreational benefits include over 430 miles of designated recreational trails (e.g., horse, bike, hiking and interpretive), over 940 campsites/cabins, back country camping, swimming beaches, hunting, fishing, picnicking, mushrooming and many other opportunities under this management philosophy.
- Compartment and tract designations for each state forest are available at: <https://www.in.gov/dnr/forestry/3635.htm>
- Like other forms of hauling, log trucks must follow all county, state and federal laws.

	<ul style="list-style-type: none">• An improvement harvest is an intermediate management harvest method designed to assist the development and growing conditions of existing trees. Trees selected for removal are sold. Timber Stand Improvement (TSI) can be a pre or post-harvest management tool used to control vines, invasive species, manipulate the understory, or manage undesirable trees not removed during the harvest. Because TSI often targets small diameter or non-merchantable trees no trees are sold.• Compartment 4 Tract 10 is not visible from Skyline Drive.• No pine trees were tallied during the collection of data for these draft RMGs. Therefore, no pine conversion or larger openings from the removal of pine was recommended.• Not all ash trees will be removed. As with any harvest conducted on State Forest's those that show signs of resistance, already dead, or too far gone remain for tree species diversity or wildlife habitat.• Forest management activities ensure forests remain healthy, vigorous, diverse, and adequately stocked. Overstocking and largely over mature conditions jeopardize forest health, resiliency and resistance making them more vulnerable to mortality and disease and insect outbreaks.• The hiking trail used to access Pinnacle Peak and Pinnacle Peak itself, are not located in the tracts covered by these draft RMG's. Thus, Pinnacle Peak will not be impacted by the proposed management activities.
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